

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JESSICA GUASTO,

Plaintiff,

CASE NO.: 1:22-cv-21004-DPG

v.

THE CITY OF MIAMI BEACH, FL,
a Florida municipality, *et al.*

Defendants.

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS’ MOTION TO STRIKE PLAINTIFF’S EXPERT REPORT AND
AMENDED EXPERT DISCLOSURE**

Plaintiff, JESSICA GUASTO (hereafter referred to as the “Plaintiff”), pursuant to S.D. Fla. Local Rule 7.1(a)(1)(J), and Rule 6(b)(1), Fed.R.Civ.P., hereby moves this Court for an extension of time of fourteen (14) days, up to and including March 11, 2024, to respond to Defendant’s Motion to Strike Plaintiff’s Expert Report and Amended Expert Disclosure, and in support states as follows:

1. On or about February 13, 2024, Attorney Paul A. Daragjati for/by Plaintiff filed a Motion to Withdraw as Attorney [D.E. 42].
2. On or about February 14, 2024, Defendant, THE CITY OF MIAMI BEACH, FL, a Florida municipality (the “City”), filed its Motion to Strike Plaintiff’s Amended Expert Witness Disclosure and Expert Report and Incorporated Memorandum of Law (the “Motion”) [D.E.43].
3. Plaintiff’s response to the City’s Motion is due February 28, 2024 [D.E. 43].
4. On or about February 22, 2024, the Court granted the Motion to Withdraw Mr. Paul A. Daragjati as counsel of record for Plaintiff [D.E. 44].

5. On or about February 26, 2024, Plaintiff retained a new counsel of record [D.E. 45].

6. Plaintiff seeks a fourteen-day extension of time to respond to the Motion because she retained new counsel within two (2) days of the deadline to respond to the Motion.

7. The request for extension is reasonable under the circumstances, is not sought for the purpose of delay, and will not prejudice any party.

WHEREFORE, Plaintiff JESSICA GUASTO respectfully requests the Court to enter an Order granting an extension of time for Plaintiff to Respond to Defendant's Motion to Strike Plaintiff's Expert Report and Amended Expert Disclosure.

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 7.1(a)(3), I hereby certify that counsel for the Plaintiff has conferred with counsel for the Defendants, who has advised that the Defendants do not oppose the relief requested herein.

Dated: Miami, Florida
February 26, 2024,

DEREK SMITH LAW GROUP, PLLC
Counsel for Plaintiff

/s/ Daniel J. Barroukh
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document is being served on February 26, 2024, on all counsel of record on the service list below via transmission of Notices of Electronic Filing generated by CM/ECF.

By: /s/ Daniel J. Barroukh
Daniel J. Barroukh, Esq.

SERVICE LIST

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